

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

Index No.:

-----X  
PARRIS WILSON,

Plaintiff(s),

-against-

**SUMMONS**

Plaintiff resides at:

111 E 128<sup>th</sup> Street, Apt 5Y

New York, New York 10035

THE CITY OF NEW YORK, NEW YORK CITY  
POLICE DEPARTMENT, POLICE OFFICER KEITHLYN  
FREDERICK, SHIELD #05989, OF THE NARCOTIC  
BOROUGH MANHATTAN NORTH and DETECTIVE  
SHAWN WILKINSON, SHIELD #04059, OF THE  
NARCOTIC BOROUGH MANHATTAN NORTH,

Defendant(s),  
-----X

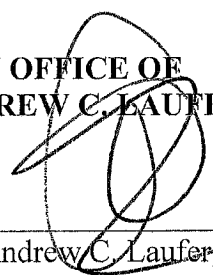
To the above named defendant(s):

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the plaintiff's attorney within 20 days after service of this summons or within 30 days after the service is complete if this summons is not personally delivered to you within the state of New York; and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

The basis of the venue designated is the place of incident.

Dated: New York, New York  
March 12, 2014

**LAW OFFICE OF  
ANDREW C. LAUFER, PLLC**

  
By: Andrew C. Laufer, Esq.,  
Attorney for Plaintiff  
255 W 36<sup>th</sup> Street, Suite 1104  
New York, New York 10018  
(212)422-1020

**DEFENDANT'S ADDRESS**

THE CITY OF NEW YORK  
100 Church Street, 4<sup>th</sup> Floor  
New York, New York 10007

NEW YORK CITY POLICE DEPARTMENT  
c/o CITY OF NEW YORK  
100 Church Street, 4<sup>th</sup> Floor  
New York, New York 10007

POLICE OFFICER KEITHLYN FREDERICK, SHIELD #05989  
OF NARCOTIC BOROUGH MANHATTAN NORTH  
2768 8<sup>th</sup> Avenue, Between East 147<sup>th</sup> & 148<sup>th</sup> Street  
New York, New York

DETECTIVE SHAWN WILKINSON, SHIELD #04059  
OF NARCOTIC BOROUGH MANHATTAN NORTH  
2768 8<sup>th</sup> Avenue, Between East 147<sup>th</sup> & 148<sup>th</sup> Street  
New York, New York

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

Index No.:

-----X  
PARRIS WILSON,

Plaintiff(s),

-against-

**VERIFIED COMPLAINT**

THE CITY OF NEW YORK, NEW YORK CITY  
POLICE DEPARTMENT, POLICE OFFICER KEITHLYN  
FREDERICK, SHIELD #05989, OF THE NARCOTIC  
BOROUGH MANHATTAN NORTH and DETECTIVE  
SHAWN WILKINSON, SHIELD #04059, OF THE  
NARCOTIC BOROUGH MANHATTAN NORTH,

Defendant(s),

-----X

Plaintiff, by and through his attorney, Law Office of Andrew C. Laufer, PLLC complaining of the defendants herein, upon information and belief, respectfully show to this Court, and allege as follows:

**PRELIMINARY STATEMENT**

1. That at all times hereinafter mentioned the plaintiff was a resident of the County of New York, City and State of New York.
2. That at all times hereinafter mentioned the defendant, THE CITY OF NEW YORK was and is a municipal corporation, duly organized and existing under by virtue of the laws of the State of New York.
3. That at all times hereinafter mentioned the defendant, NEW YORK CITY POLICE DEPARTMENT was and is a municipal corporation, duly organized and existing under by virtue of the laws of the State of New York.
4. That at all times hereinafter mentioned the defendants, POLICE OFFICER KEITHLYN FREDERICK, SHIELD #05989 OF THE NARCOTIC BOROUGH MANHATTAN NORTH and DETECTIVE SHAWN WILKINSON, SHIELD #04059 OF THE NARCOTIC BOROUGH

MANHATTAN NORTH, were and still are employed with the NEW YORK CITY POLICE DEPARTMENT.

5. That prior to the institution of this action, a notice of claim was duly served upon and filed with the city on behalf of plaintiff.

6. That on or about October 30, 2013 a hearing was held by the City pursuant to municipal law 50H.

7. That at all time herein mentioned the officers were acting within the scope and course of their employment with the New York Police Department, and under color of state law.

8. That at all times herein mentioned, all of the actions of the officers alleged herein was done within the scope and course of his employment with the New York Police Department, and under color of the state law.

9. That all of the causes of action pleaded herein fall within one or more of the exceptions set forth in New York's Civil Practice Law & Rules 1602 with respect to joint and several liability.

#### **FIRST CAUSE OF ACTION**

10. Plaintiff repeats and realleges each and every allegation contained above as though set forth at length herein.

11. That on or about April 20, 2013, at approximately 2:30 PM, at 107 E 126<sup>th</sup> Street, New York, New York, in the County of New York, City and State of New York, its agents, servants and employees, including but not limited to Police Officer Keithlyn Frederick, Shield #05989 of the Narcotic Borough Manhattan North and Detective Shawn Wilkinson, Shield #04059 of the Narcotic Borough Manhattan North, wrongfully and falsely arrested, imprisoned and detained plaintiff without any right or justifiable grounds therefore.

12. That the aforesaid arrest, detention and imprisonment continued at the Narcotic Borough Manhattan North and elsewhere.

13. That the said arrest, detention and imprisonment was caused by the City, its agents, servants and employees, including but not limited to the police officers, without a warrant and without any reasonable cause or belief that plaintiff was in fact guilty of any crime.

14. That the city, its agents, servants and employees, as set forth above, intended to confine plaintiff; that plaintiff was conscious of the confinement; that plaintiff did not consent to the confinement; and that the confinement was not otherwise privileged.

15. That by reason of the false arrest, imprisonment and detention of plaintiff, plaintiff was subjected to great indignities, humiliation and ridicule in being so detained, and was greatly injured in his credit and circumstances and was prevented and hindered from performing and transacting his necessary affairs and his business and employment, and was caused to suffer much pain in both mind and body, and to sustain economic loss, and was otherwise damaged.

#### **SECOND CAUSE OF ACTION**

16. Plaintiff repeats and realleges each and every allegation contained in the First Cause of Action as if fully set forth at length herein.

17. That immediately prior to and during the course of his arrest and detention, plaintiff was assaulted and battered by said police officers.

18. That the reason of the aforesaid, plaintiff sustained personal injuries, endured and will endure pain and suffering and loss of enjoyment of life, and economic loss, and was otherwise damaged.

### **THIRD CAUSE OF ACTION**

19. Plaintiff repeats and realleges each and every allegation contained in the First, Second and Third Causes of Action as if fully set forth at length herein.

20. That the aforesaid actions, and resulting injuries to plaintiff, were due to the negligence of the City in the hiring, retention, and training of its employees, including the police officers involved in the arrest, assault and battery, and malicious prosecution of the plaintiff.

### **FOURTH CAUSE OF ACTION**

22. Plaintiff repeats and realleges each and every allegation contained in the First, Second and Third and Fourth Causes of Action as if fully set forth at length herein.

23. That plaintiff was deprived of his rights, privileges and immunities secured by the Constitution of the United States of America and of the state of New York, and his rights pursuant to 42 USC sec.1983 by those who, under color of a statute or regulation of a state, caused plaintiff to be so deprived.

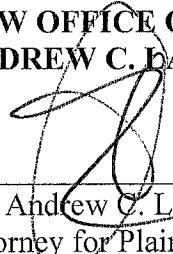
24. That the aforesaid actions by the detective officer were done pursuant to an official municipal policy or custom of the city, which policy involved the indiscriminate detention, interrogation, intimidation, and prosecution of individuals were engaged in criminal conduct, and for the purpose of thwarting the fair administration of justice.

25. That defendants herein, their agents, servants and employees, motivated in part by racial and/ or ethnic animus, conspired to deprive plaintiff of his federal civil and constitutional rights, in violation of 42 USC 1985.

**WHEREFORE**, plaintiff demands judgment against defendants, and each of them, on all of the foregoing causes of action, in the form of compensatory damages for his pain and suffering, loss of enjoyment of life, and economic loss, in an amount that exceeds the jurisdictional limits of all lower courts that otherwise would have jurisdiction in the matter, and plaintiff further demands punitive damages on all causes of action, in an amount to be determined by the trier of fact, together with attorney's fees, and together with costs and disbursements.

Dated: New York, New York  
March 12, 2014

**LAW OFFICE OF  
ANDREW C. LAUFER, PLLC**



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By: Andrew C. Laufer, Esq.,  
Attorney for Plaintiff  
255 W 36<sup>th</sup> Street, Suite 1104  
New York, New York 10018  
(212)422-1020

INDIVIDUAL VERIFICATION

STATE OF NEW YORK     )  
                                      ) ss.:  
COUNTY OF NEW YORK )

**PARRIS WILSON**, individually, being duly sworn, deposes and states as follows:

I am the Plaintiff in the above-entitled action and therefore am fully familiar with the circumstances surrounding this situation. I have read the foregoing Summons and Complaint and know the contents thereof; that the same is true to my knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters I believe them to be true.

Dated:       New York, New York  
              February 13, 2014  
              *mark*

  
\_\_\_\_\_  
PARRIS WILSON

Sworn to and subscribed before me  
on the 13 day February, 2014

  
\_\_\_\_\_  
NOTARY PUBLIC

**Andrew Charles Laufer**  
**Notary Public, State of New York**  
**No. 01LA5087616**  
**Qualified in Nassau County**  
**Commission Expires Nov. 03, 2013** 7



PARRIS WILSON,

Plaintiff(s),

-against-

THE CITY OF NEW YORK, NEW YORK CITY POLICE DEPARTMENT, POLICE OFFICER  
KEITHLYN FREDRICK, SHIELD #05989 OF THE NARCOTIC BOROUGH MANHATTAN NORTH  
and DETECTIVE SHAWN WILKINSON, SHIELD #04059, OF THE NARCOTIC BOROUGH  
MANHATTAN NORTH,

Defendant(s),

**SUMMONS & COMPLAINT**

LAW OFFICE OF ANDREW C. LAUFER, PLLC

**Attorney(s) for PLAINTIFF**

Office and Post Office Address  
255 W. 36th Street, Suite 1104  
New York, NY 10018

Tel: (212) 422 1020  
Fax: (212) 422 1069

To:

Signature (Rule 130-1.1-a)

Print name beneath

Service of a copy of the within is hereby admitted.

Dated:

Attorney(s) for:

**PLEASE TAKE NOTICE:**

☐ NOTICE OF ENTRY

that the within is a (certified) true copy of a  
duly entered in the office of the clerk of the within named court on

☐ NOTICE OF SETTLEMENT

that an order of which the within is a true copy  
will be presented for settlement to the HON one of the judges of the  
within named Court at

on at M.  
Dated,

Yours, etc.

LAW OFFICE OF ANDREW C. LAUFER, PLLC